

Urquhart, Rachel

From: Urquhart, Rachel
Sent: Wednesday, July 02, 2008 4:20 PM
To: 'Armand Andry'
Cc: Graber, Brent; Bulger, Brian
Subject: RE: Discovery responses

Mr. Andry,

It is now past the second extension of time that you indicated that you needed to respond to our discovery requests, and I have not received anything.

If we have not received Plaintiff's responses by July 7, 2008, we will be forced to file a motion to compel compliance with our discovery requests in order to ensure that your lack of diligence does not interfere with Defendant's ability to comply with the discovery schedule that the Parties jointly filed, and with Judge Manning's minute order setting the 8/21/2008 status conference "with the understanding that the parties are diligently pursuing discovery within the parameters set by Magistrate Judge Ashman and are mindful of the discovery cut-off date."

Please also provide available dates for your client's deposition in late July/early August.

Thank you,

Rachel Urquhart

From: Urquhart, Rachel
Sent: Tuesday, June 17, 2008 9:45 AM
To: 'Armand Andry'
Cc: Graber, Brent
Subject: RE: Discovery responses

Mr. Andry,

We are agreeable to an extension until the end of the month to respond to our outstanding discovery. If you need more time than that, you will need to file a motion, as this is the second request for an extension that we have agreed to.

Thank you,

Rachel Urquhart.

From: Armand Andry [mailto:armandandry@hotmail.com]
Sent: Monday, June 16, 2008 5:58 AM
To: Urquhart, Rachel
Cc: Lampkin, Gerald
Subject: Discovery responses

EXHIBIT B

7/11/2008

Dear Ms. Urguhart:

Because of the press of deadlines on other cases and because of computer issues (I have windows VISTA which has experienced a number of problems for all VISTA's users) I will need another two weeks or so to complete responses to discovery. Please let me know if that is agreeable with you.

Thank you in advance for your consideration.

Armand L. Andry

7/11/2008